Errata sheet for

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD SAN DIEGO REGION

TENTATIVE ORDER NO. R9-2003-0008 NPDES PERMIT NO. CA0109185

WASTE DISCHARGE REQUIREMENTS

FOR

U.S. NAVY

NAVAL BASE CORONADO

SAN DIEGO COUNTY

The following changes are made in response to comments submitted to the Regional Board by interested persons or made to correct or clarify the tentative Order No. R9-2003-0008, tentative Monitoring and Reporting Program or Fact Sheet. The deleted text is shown as *strikethrough*; added text is shown as *underlined*.

1. Tentative Order No. R9-2003-0008

1.a. The *Table of Contents* shall be modified as noted below and page numbering and designations shall be modified as necessary.

3.	Engine Cooling/Sprinkler Water	M-5
1	Pier Boom Cleaning	M_{-6}
т.	Tier Boom Cleaning	171 0
5.	Pier Cleaning	M-7

- 1.b. On page 1, *Finding 1*, modify the text as noted below.
 - Naval Air Station, North Island (NAS North Island): The discharges from NAS
 North Island are ship repair and maintenance activities, steam condensate, engine
 cooling/sprinkler water, pier boom cleaning, utility vault & manhole dewatering,
 miscellaneous discharges associated with facility maintenance, pier cleaning and
 industrial storm water.

- *Naval Amphibious Base* (NAB): The discharges from NAB are ship repair and maintenance activities, steam condensate, engine cooling/sprinkler system, pier boom cleaning, utility vault & manhole dewatering, miscellaneous discharges associated with facility maintenance, pier cleaning and industrial storm water.
- Survival, Evasion, Resistance, and Escape Training Center (SERE) and La Posta
 Mountain Warfare Training Center (La Posta MWTC): These 2 facilities do not have
 any point source discharges and do not have industrial storm water discharges. This
 tentative Order does not regulate any discharges from either the SERE or La Posta
 MWTC.
- 1.c. On page 1, *Finding 2*, modify the text as noted below.
 - 2. The *point source* discharges, as identified in the RWD, are grouped into 65 general industrial processes:
 - Steam Condensate:
 - Utility Vault & Manhole Dewatering;
 - Engine Cooling/Sprinkler Water;
 - Pier Boom Cleaning;
 - Miscellaneous Discharges Associated with Facility Maintenance (landscape watering runoff, potable water & fire system maintenance, provided the miscellaneous discharge is not regulated pursuant to Order No. R9-2002-0020, NPDES No. CAG6790001 (i.e., Hydrostatic Test Water and Potable Water discharges) or other applicable NPDES permits); and
 - Pier Cleaning.

2. Attachment B

On page 3, *Table 2.* Discharge Coordinates for Utility Vaults at NAS North Island, NAB, and NRRF add the coordinates as note below:

Switch Station h	32°41' N/A 20''	117°11′ N/A 27″
Quay Wall m12	32°42' N/A 17"	117°11' N/A 06''

3. Attachment D

On page 3, modify **Item 4.f** as noted below.

f. For the NAVSTA NAS North Island, and the NAB, identify the boundaries of the high-risk areas.

4. Tentative Monitoring and Reporting Program No. R9-2003-0008

On page M-6, the text shall be modified as noted below and shall be renumber accordingly.

4. Pier Boom Cleaning

Annually, the discharger shall submit a log of boom cleaning activity including the duration, the personnel in-charge of the cleaning, the quantity of the discharge, the date, a summary of any potential impacts to receiving water quality, and a summary regarding the description and location of any booms removed from the Bay to be cleaned because of oil or other pollutant.

5. Fact Sheet for Tentative Order No. R9-2003-0008

5.a. The *Table of Contents* shall be modified as noted below and the sections shall be redesignated as necessary.

Δ	Pier Boom Cleaning	γ	5
- -	Tel Boom Cleaning	۷.	J
f.	Miscellaneous Discharge Associated with Facilities Maintenance	2	ϵ
g.	Pier Cleaning	2	7

5.b. On page 1, modify the text as noted below.

A separate NPDES Permit has been or is being developed for each complex. The *Naval Base Coronado* (NBC) Complex has various point source discharges and industrial storm water discharges. The *point source* discharges identified by the Navy at NBC are grouped into six general industrial processes:

- Steam Condensate:
- Utility Vault & Manhole Dewatering;
- Engine Cooling/Sprinkler Water;
- Pier Boom Cleaning;

- Miscellaneous Discharges Associated with Facility Maintenance; and
- Pier Cleaning.
- 5.c. On page 3 modify the text as noted below.

A location map showing the different NBC installations is attached to the tentative Order as *Attachment A*. The SERE and the La Posta MWTC do not have any point source discharges and do not have any industrial storm water discharges. Therefore, the location of the SERE and La Posta MWTC are not identified on the location map. <u>Tentative Order No. R9-2003-0008 does not regulate any discharges from either the SERE or La Posta MWTC</u>.

5.d. On page 5 modify the 3rd full paragraph as noted below.

The <u>IWPT IWTP</u> and ORP are located on the same facility plot. The storm water at the IWPT and ORP facility is collected and diverted to the sanitary sewer system.

5.e. On page 5 modify the text as noted below.

All industrial storm water discharges will be regulated by this Order. There are high concentrations of copper and zinc in <u>some of</u> the industrial storm water discharges from the NAS North Island. Therefore, effluent limitations for toxicity are included in the tentative Order. Additional information regarding the industrial storm water discharges at NAS North Island is included in the *Industrial Storm Water Discharge, Section III* of this Fact Sheet.

Point Source Discharges

Point source discharges (ship repair and maintenance activities, steam condensate, engine cooling/sprinkler water, pier boom cleaning, utility vault & manhole dewatering, miscellaneous discharges associated with facility maintenance, and pier cleaning) from the NAS North Island are described in the *Point Source Discharge* section of this *Fact Sheet*. The *Point Source Discharge* section describes those discharges identified by the CNSRW in its NPDES application or identified by the Regional Board during inspections of the NBC Complex.

5.f. On page 6 modify the text as noted below.

Industrial Storm Water Discharges

The industrial storm water discharges from the NAB are currently regulated by the General Industrial Storm Water Permit, Order No. 97-03-DWQ, WDID 937S001522. After the adoption of the tentative Order, enrollment pursuant to Order No. 97-03-DWQ will be superseded. There have been high concentrations of copper and zinc in <u>some of</u> the industrial

storm water discharges at the NAB. Therefore, effluent limitations for toxicity are included in the Order. Additional information regarding the industrial storm water discharges at NAB is included in the *Industrial Storm Water Discharge*, *Section III* of this Fact Sheet.

Point Source Discharges

Point source discharges (ship repair and maintenance activities, steam condensate, engine eooling/sprinkler system, pier boom cleaning, utility vault & manhole dewatering, miscellaneous discharges associated with facility maintenance, and pier cleaning) from the NAB are described in the *Point Source Discharge* section of this *Fact Sheet*.

5.g. On page 7 modify the 1st full paragraph as noted below.

North South and southwest of the Naval Radio Receiving Facility (NRRF) is Camp Surf, a YMCA aquatic activities and education camp for youth on land leased from the Navy. On Camp Surf is a wetland that fills with storm water runoff during the rainy season. A concrete lined swale drains the wetland area of excess rainwater to the ocean. This swale also brings storm water runoff from an Imperial Beach residential area south of Camp Surf. Since the wetland area and swale are below sea level, a water level controlled pump house is activated to pump the storm water to an ocean outfall at approximately 20 gallons per minute. The storm water outfall is located on the beach adjacent to Camp Surf.

- 5.h. On page 8 modify the text as shown below.
- ... The SERE facility does not have any point source discharges.

Tentative Order No. R9-2003-0008 does not regulate any discharges from the SERE facility.

. . . The La Posta MWTC facility does not have any point source discharges.

<u>Tentative Order No. R9-2003-0008 does not regulate any discharges from the La Posta MWTC facility.</u>

5.i. On page 9, modify the text as noted below.

The *point source* discharges identified in the RWD are grouped into six general industrial processes:

- Steam Condensate;
- Utility Vault & Manhole Dewatering;
- Engine Cooling/Sprinkler Water;

- Pier Boom Cleaning;
- Miscellaneous Discharges Associated with Facility Maintenance; and
- Pier Cleaning.
- 5.j. On page 11 modify the text as noted below, insert paragraph just before **Table 1.** Steam Condensate Discharge Analyses, Steam Manhole.

As shown in *Table 1. Steam Condensate Discharge Analyses, Steam Manhole* and *Table 2. Steam Condensate Discharge Analyses, Quay Wall* the NPDES application included laboratory analyses for the steam condensate discharges from the identified locations. The *Steam Manhole* discharges occurred into a utility vault manhole. The discharges from the manholes will be regulated as a utility vault and manhole discharge. Because the reported chemical concentrations in the discharge are low and the discharge flow rates are low, the *Steam Condensate* discharges are not a significant threat to water quality.

By e-mail dated March 21, 2003, and by comment letter dated March 26, 2003, the Navy reported that 1-2 Tank does not discharge to waters of the state. The 1-2 Tank steam condensate either recycles to the steam plant or is discharged to the sanitary sewer system. The 1-2 Tank was resampled on March 14, 2003 and the copper concentration was reported as 0.09 mg/L and the zinc concentration was reported as 0.02 mg/L. The steam condensate for 1-2 Tank is from the condensate return line of the steam system.

5.k. On page 25, modify the text as noted below.

e. Pier Boom Cleaning

Security booms, oil containment booms, moorings, and fender systems are placed around vessels and piers at NAS North Island. The security and oil containment booms placed around the vessels and piers, and the pier mooring and fender systems have marine growth on them. The marine growth can cause the booms, moorings, and fender systems to sink. The marine growth is washed off with high-pressure sea water. The booms, mooring, and fender systems are not removed from the water during the cleaning process.

Typically, booms, moorings, and fender systems are cleaned twice per year on a quarterly rotational basis. The high-pressure washer discharges 5 gpm and operates six hours/day for 2-3 weeks per quarter for at total annual discharge of approximately 0.108 million gallons.

After a response to an oil spill, the oily booms are removed from the Bay by barge and transported to a designated cleaning area at the Naval Station, San Diego for cleaning. The cleaning water from the designated cleaning area discharges to the bilge and oily water treatment system (BOWTS) and then to the sanitary sewer system.

The discharge of high pressure wash water for boom, mooring, and fender system cleaning could be subject to regulations in the Implementation Policy. MRP No. R9-2003-0008 requires monitoring for evaluating compliance with the Implementation Policy.

An annual reporting log of boom, mooring and fender system cleaning activity and the removal of any oily booms for cleaning is required by the tentative Order.

5.l. On page 29, add the following 3 paragraphs at the end the introductory portion of section III. Industrial Storm Water Discharges and before the beginning of III.a. Naval Air Station, North Island ((NAS, North Island).

The discharges from ship repair and maintenance activities may result in industrial storm water discharges with a *high risk* potential to impact water quality. *High risk areas* are areas where significant quantities of wastes or pollutants (including abrasive blast grit material, primer, paint, paint chips, solvents, oils, fuels, sludges, detergents, cleaners, hazardous substances, toxic pollutants, non-conventional pollutants, materials of petroleum origin, or other substances of water quality significance) are subject to exposure to precipitation and runoff.

The tentative Order requires the NAS North Island and NAB facility to terminate the first ¼ inch of industrial storm water discharges from all high-risk areas within 2 years of adoption.

Effluent limitations are included in the tentative Order for industrial storm water discharges from the NAS North Island and NAB. The effluent limitations require the industrial storm water discharges from the NAS North Island and NAB be free from toxic materials in toxic amounts (CWA, Section 101(a)(3)). The specifications for storm water toxicity are a performance goal for 4 years and are an enforceable limit after 4 years from the adoption of the tentative Order.

5.m. On page 40 modify the text as noted below.

Pursuant to the *NPDES Permit Rating Worksheet*, the proposed discharge from the Naval Base San Diego Coronado has a point score of 515. The Point Score includes a rationale to make the facility a *discretionary major*. The rationale for a discretionary major classification is that the facility includes a large area and includes significant industrial storm water discharges.

Table 13. Discharge flow rates for Naval Base Coronado.

	Daily flow (million	Annual flow (million
Discharge	gallons)	gallons)
Utility Vault and Manhole dewatering	varies	varies
Steam Condensate	0.000375	0.137
Diesel Engine cooling/sprinkler	0.235	12.2
Pier boom cleaning (3 weeks per quarter)	-0.0018	0.108
Miscellaneous Discharges (landscape	0.00	0.00

Discharge	Daily flow (million gallons)	Annual flow (million gallons)
watering runoff, portable water & fire		
system maintenance, etc.)		
Total flow =	0.237 <u>0.235</u>	12.4 <u>12.3</u>

5.n. On page 42, modify the text as noted below.

For the purpose of the *Bays and Estuaries Policy* and tentative Order No. R9-2003-0008, the discharge of the following wastes will be considered innocuous nonmunicipal wastewaters and, as such, will not be considered industrial process wastes:

- Utility Vault & Manhole Dewatering;
- Steam Condensate;
- Diesel Engine Cooling/Sprinkler Water;
- Pier Boom Cleaning;
- Miscellaneous Discharges Associated with Facility Maintenance(landscape watering runoff, potable water & fire system maintenance); and
- Pier Cleaning.

5.o. On page 43, modify the text as noted below.

The discharger is required to conduct sampling analyses of the following discharges and receiving waters:

- Steam Condensate:
- Diesel Engine Cooling/Sprinkler Water;
- Pier Boom Cleaning;
- Utility Vault and Manhole Dewatering;
- Miscellaneous Discharges Associated with Facility Maintenance; and
- Pier Cleaning.